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11 UBER TECHNOLOGIES, INC.,
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13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **SAN FRANCISCO DIVISION**

16
17 IN RE: UBER TECHNOLOGIES, INC.,
18 PASSENGER SEXUAL ASSAULT
LITIGATION

19 This Document Relates to:

20 *D.P. v. Uber Technologies, Inc., et al.,*
21 *No. 3:24-cv- 04449-CRB*

22 *Jane Roe CL 17 v. Uber Technologies,*
23 *Inc., et al., No. 3:24-cv-04915-CRB*

24 *Jane Roe CL 37 v. Uber Technologies,*
25 *Inc., et al., No. 3:24-cv-05728-CRB*

26 *Jane Roe CL 38 v. Uber Technologies,*
27 *Inc., et al., No. 3:24-cv-05729-CRB*

28 *Jane Roe CL 67 v. Uber Technologies,*
Inc., et al., No. 3:24-cv-06191-CRB

Case No. 3:23-md-03084-CRB

**DECLARATION OF MICHAEL B.
SHORTNACY REGARDING
PLAINTIFFS NOT IN COMPLIANCE
WITH THE COURT'S SEPTEMBER 8,
2025 ORDER [ECF 3862]**

Judge: Hon. Charles R. Breyer
Courtroom: 6-17th Floor

1 *Jane Roe CL 70 v. Uber Technologies,*
2 *Inc., et al., No. 3:24-cv-06863-CRB*

3 *Jane Roe CL 71 v. Uber Technologies,*
4 *Inc., et al., No. 3:24-cv-06864-CRB*

5 *Jane Roe CL 76 v. Uber Technologies,*
6 *Inc., et al., No. 3:24-cv-07569-CRB*

7 *Jane Roe CL 77 v. Uber Technologies,*
8 *Inc., et al., No. 3:24-cv-07571-CRB*

9 *Jane Roe CL 79 v. Uber Technologies,*
10 *Inc., et al., No. 3:24-cv-07587-CRB*

11 *A.R. v. Uber Technologies, Inc., et al.,*
12 *No. 3:24-cv-08177-CRB*

13 *Jane Roe CL 81 v. Uber Technologies,*
14 *Inc., et al., No. 3:24-cv-08521-CRB*

15 *Jane Roe CL 83 v. Uber Technologies,*
16 *Inc., et al., No. 3:24-cv-08525-CRB*

17 *L.G. v. Uber Technologies, Inc., et al.,*
18 *No. 3:24-cv-09036-CRB*

19 *Jane Roe CL 88 v. Uber Technologies,*
20 *Inc., et al., No. 3:24-cv-09145-CRB*

21 *G.C. v. Uber Technologies, Inc., et al.,*
22 *No. 3:24-cv-09195-CRB*

23 *Jane Roe CL 91 v. Uber Technologies,*
24 *Inc., et al., No. 3:24-cv-09235-CRB*

25 *Jane Roe CL 92 v. Uber Technologies,*
26 *Inc., et al., No. 3:24-cv-09237-CRB*

27 *Jane Roe CL 93 v. Uber Technologies,*
28 *Inc., et al., No. 3:24-cv-09549-CRB*

Jane Roe CL 98 v. Uber Technologies,
Inc., et al., No. 3:25-cv-00853-CRB

Jane Roe CL 101 v. Uber Technologies,
Inc., et al., No. 3:25-cv-01118-CRB

Jane Roe CL 102 v. Uber Technologies,

1 *Inc., et al., No. 3:25-cv-01120-CRB*

2 *Jane Roe CL 107 v. Uber Technologies,*
3 *Inc., et al., No. 3:25-cv-01470-CRB*

4 *Jane Roe CL 109 v. Uber Technologies,*
5 *Inc., et al., No. 3:25-cv-01652-CRB*

6 *Jane Roe CL 110 v. Uber Technologies,*
7 *Inc., et al., No. 3:25-cv-01653-CRB*

8 *Jane Roe CL 114 v. Uber Technologies,*
9 *Inc., et al., No. 3:25-cv-01942-CRB*

10 *C.B. v. Uber Technologies, Inc., et al.,*
11 *No. 3:25-cv-01961-CRB*

12 *Jane Roe CL 118 v. Uber Technologies,*
13 *Inc., et al., No. 3:25-cv-02132-CRB*

14 *Jane Roe CL 119 v. Uber Technologies,*
15 *Inc., et al., No. 3:25-cv-02133-CRB*

16 *Jane Roe CL 122 v. Uber Technologies,*
17 *Inc., et al., No. 3:25-cv-02138-CRB*

18 *Jane Roe CL 126 v. Uber Technologies,*
19 *Inc., et al., No. 3:25-cv-02495-CRB*

20 *Jane Doe NLG (PB) v. Uber*
21 *Technologies, Inc., et al., No. 3:25-cv-*
22 *02938-CRB*

23 *Jane Roe CL 138 v. Uber Technologies,*
24 *Inc., et al., No. 3:25-cv-03137-CRB*

25 *Jane Roe CL 139 v. Uber Technologies,*
26 *Inc., et al., No. 3:25-cv-03255-CRB*

27 *Jane Roe CL 147 v. Uber Technologies,*
28 *Inc., et al., No. 3:25-cv-03811-CRB*

Jane Roe CL 148 v. Uber Technologies,
Inc., et al., No. 3:25-cv-03812-CRB

Jane Roe CL 150 v. Uber Technologies,
Inc., et al., No. 3:25-cv-03815-CRB

Jane Roe CL 151 v. Uber Technologies,

1 *Inc., et al., No. 3:25-cv-03816-CRB*

2 *Jane Roe CL 158 v. Uber Technologies,*
3 *Inc., et al., No. 3:25-cv-04038-CRB*

4 *Jane Roe CL 160 v. Uber Technologies,*
5 *Inc., et al., No. 3:25-cv-04205-CRB*

6 *Jane Roe CL 161 v. Uber Technologies,*
7 *Inc., et al., No. 3:25-cv-04206-CRB*

8 *Jane Roe CL 164 v. Uber Technologies,*
9 *Inc., et al., No. 3:25-cv-04587-CRB*

10 *Jane Roe CL 165 v. Uber Technologies,*
11 *Inc., et al., No. 3:25-cv-04589-CRB*

12 *Jane Roe CL 166 v. Uber Technologies,*
13 *Inc., et al., No. 3:25-cv-04591-CRB*

14 *Jane Roe CL 167 v. Uber Technologies,*
15 *Inc., et al., No. 3:25-cv-04670-CRB*

16 *Jane Roe CL 169 v. Uber Technologies,*
17 *Inc., et al., No. 3:25-cv-04672-CRB*

18 *Jane Roe CL 170 v. Uber Technologies,*
19 *Inc., et al., No. 3:25-cv-04705-CRB*

DECLARATION OF MICHAEL B. SHORTNACY

I, Michael B. Shortnacy, declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and am a resident of Los Angeles, CA. I respectfully submit this declaration identifying the plaintiffs that are not in compliance with the Court's September 8, 2025 Order [ECF 3862].

2. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., attorneys of record for Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC, (collectively, "Uber"). I am a member in good standing of the Bar of the State of California, the Bar of the State of New York, and the Bar of the District of Columbia. I know the following facts to be true of my own knowledge, except those matters stated to be based on information and belief, and if called to testify, I could competently do so.

3. On September 8, 2025, the Court ordered each Plaintiff subject to Uber's Motion to Dismiss Cases for Failure to Comply with PTO 5 to provide a bona fide ride receipt, or in cases where is receipt is not readily available, to disclose to Defendants: (1) why the receipt is unavailable; (2) the name, phone number, and email address of the accountholder who ordered the ride; (3) the date of the ride, with as much precision as is reasonably possible; (4) the starting location and ending location of the ride, with as much precision as is reasonably possible; (5) any other basic information that may assist Defendants in identifying the ride; and (6) if items (2) through (5) cannot be provided with precision or cannot be provided at all, an explanation as to why the information is not readily ascertainable, within 14 days of the Order. The Order therefore compelled compliance by each Plaintiff subject to the Order by September 22, 2025.

4. The Court also ordered counsel for Uber to submit a declaration within 21 days of the Order (*i.e.*, by September 29, 2025), identifying which, if any, Plaintiffs did not comply with the Court's Order.

5. On September 23, 2025, counsel for Uber reviewed MDL Centrality to determine which Plaintiffs subject to the Court's September 8, 2025, Order failed to provide a ride receipt or a ride information form disclosing: (1) why the receipt is unavailable; (2) the name, phone number, and email address of the accountholder who ordered the ride; (3) the date of the ride, with as much

precision as is reasonably possible; (4) the starting location and ending location of the ride, with as much precision as is reasonably possible; (5) any other basic information that may assist Defendants in identifying the ride; and (6) if items (2) through (5) cannot be provided with precision or cannot be provided at all, an explanation as to why the information is not readily ascertainable, as ordered by the Court.

6. Based on counsel for Uber's review of MDL Centrality, as of September 23, 2025, the following Plaintiffs have failed to comply with the Court's September 8, 2025 Order:

MDLC ID	Case Name	Case Number	Plaintiff Firm
1779	Jane Roe CL 17	3:24-cv-04915	Cutter Law
2096	Jane Roe CL 37	3:24-cv-05728	Cutter Law
2098	Jane Roe CL 38	3:24-cv-05729	Cutter Law
2494	Jane Roe CL 67	3:24-cv-06191	Cutter Law
2600	Jane Roe CL 71	3:24-cv-06864	Cutter Law
2681	Jane Roe CL 77	3:24-cv-07571	Cutter Law
2683	Jane Roe CL 79	3:24-cv-07587	Cutter Law
2702	Jane Roe CL 81	3:24-cv-08521	Cutter Law
2704	Jane Roe CL 83	3:24-cv-08525	Cutter Law
2771	L.G.	3:24-cv-09036	Pro se (formerly Chaffin Luhana)
2778	Jane Roe CL 88	3:24-cv-09145	Cutter Law
2781	Jane Roe CL 91	3:24-cv-09235	Cutter Law
2782	Jane Roe CL 92	3:24-cv-09237	Cutter Law
2830	Jane Roe CL 98	3:25-cv-00853	Cutter Law
2948	Jane Roe CL 101	3:25-cv-01118	Cutter Law
2949	Jane Roe CL 102	3:25-cv-01120	Cutter Law
3250	Jane Roe CL 107	3:25-cv-01470	Cutter Law
3252	Jane Roe CL 109	3:25-cv-01652	Cutter Law
3253	Jane Roe CL 110	3:25-cv-01653	Cutter Law
3257	Jane Roe CL 114	3:25-cv-01942	Cutter Law
3262	Jane Roe CL 119	3:25-cv-02133	Cutter Law
3265	Jane Roe CL 122	3:25-cv-02138	Cutter Law
3269	Jane Roe CL 126	3:25-cv-02495	Cutter Law
3282	Jane Roe CL 139	3:25-cv-03255	Cutter Law
3437	Jane Roe CL 147	3:25-cv-03811	Cutter Law
3438	Jane Roe CL 148	3:25-cv-03812	Cutter Law
3441	Jane Roe CL 151	3:25-cv-03816	Cutter Law
3448	Jane Roe CL 158	3:25-cv-04038	Cutter Law
3450	Jane Roe CL 160	3:25-cv-04205	Cutter Law
3471	G.C.	3:24-cv-09195	Meyer Wilson
3501	D.P.	3:24-cv-04449	Meyer Wilson
3544	Jane Roe CL 164	3:25-cv-04587	Cutter Law

MDLC ID	Case Name	Case Number	Plaintiff Firm
3545	Jane Roe CL 165	3:25-cv-04589	Cutter Law
3546	Jane Roe CL 166	3:25-cv-04591	Cutter Law
3549	Jane Roe CL 169	3:25-cv-04672	Cutter Law
3550	Jane Roe CL 170	3:25-cv-04705	Cutter Law

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 23, 2025, in Los Angeles, California.

/s/Michael B. Shortnacy
Michael B. Shortnacy